

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION**

LUCIA BINOTTI, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

DUKE UNIVERSITY,

Defendant.

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Case No. 1:20-cv-00470

**PLAINTIFF'S UNOPPOSED MOTION TO  
DIRECT NOTICE TO THE CLASS OF  
PROPOSED CLASS ACTION  
SETTLEMENT**

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Fed. R. Civ. P. 23

**TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** Plaintiff Lucia Binotti hereby moves the Court, pursuant to Federal Rule of Civil Procedure 23, for an order as follows:

1. Finding that it will likely approve the Settlement;
2. Finding it will likely certify the Settlement Class upon final approval;
3. Approving the proposed plan of notice and directing notice to the Settlement Class;
4. Appointing Plaintiff's Counsel as counsel for the Settlement Class;
5. Appointing Rust Consulting as the Notice Administrator;
6. Setting a schedule for disseminating notice to Class Members, as well as deadlines to comment on, object to, or opt-out of the Class; and
5. Scheduling a final fairness hearing.

This motion is based on the accompanying memorandum of points and authorities; the Declarations of Dean M. Harvey, Travis Payne, and Robert M. Elliot; all exhibits to such documents; the pleadings and other documents on file in this case; and any argument that may be presented to the Court.

Dated: March 26, 2021

Respectfully submitted,

/s/ Dean M. Harvey

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/s/ M. Travis Payne

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/s/ Robert M. Elliot

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*Counsel for Individual and Representative  
Plaintiff Lucia Binotti*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2021, I electronically served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Dean M. Harvey  
Dean M. Harvey